

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

**LTL MANAGEMENT, LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**OMNIBUS OBJECTION TO THE DEBTOR'S FIRST DAY RELIEF**

The Ad Hoc Committee of Certain Talc Claimants (the “AHC”) in the above captioned case, by and through its undersigned counsel, hereby respectfully submits this omnibus objection (the “Objection”) to the first day relief requested by LTL Management, LLC (the “Debtor” or “LTL”) and respectfully states as follows:

**BACKGROUND**

1. The AHC incorporates by reference its *Informational Brief of the Ad Hoc Committee of Certain Talc Claimants Regarding Second Bankruptcy Filing by LTL Management, LLC* (the “AHC Informational Brief”) filed contemporaneously herewith.

**OBJECTION**

2. As set forth in the AHC Informational Brief, this bankruptcy case is fraudulent, the petition was filed in bad faith, and the Court lacks jurisdiction and should not exercise jurisdiction over the case or any matters at this time. As such, the AHC objects to the relief requested in the following:

- *Debtor's Motion for an Order Suspending Entry and Service of Standard Notice of Commencement* [Docket No. 5];
- *Debtor's Motion for an Order: (I) Authorizing it to File a List of the Top Law Firms with Talc Claims Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III)*

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

*Approving the Form and Manner of Notice of Commencement of This Case* [Docket No. 10];

- *Debtor's Application Pursuant to 28 U.S.C. § 156(C) and 11 U.S.C. § 105(A) for Entry of an Order Authorizing the Appointment of Epiq Corporate Restructuring, LLC as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date* [Docket No. 11];
- *Debtor's Motion Pursuant to 11 U.S.C. § 1505 for an Order Authorizing it to Act as Foreign Representative on Behalf of the Debtor's Estate* [Docket No. 12];
- *Debtor's Motion for an Order: (I) Approving the Continued Use of its Bank Account and Business Forms; and (II) Authorizing the Debtor's Bank to Charge Certain Fees and Other Amounts* [Docket No. 13]; and
- *Debtor's Motion for an Order Extending the Time Within Which it Must File its (I) Schedules of Assets and Liabilities and (II) Statement of Financial Affairs* [Docket No. 14] (collectively, the "First Day Motions")

The AHC respectfully requests that the Court deny all of the relief requested in the First Day Motions and

### **RESERVATION OF RIGHTS**

3. The Committee reserves all rights to amend or supplement this Objection.

### **CONCLUSION**

**WHEREFORE**, for foregoing reasons, the AHC respectfully requests that the Court (i) deny the relief requested in the First Day Motions; (ii) and grant such other and further relief as is just and proper.

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Respectfully submitted,

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